

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

LEE ROY VILLARREAL

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CAUSE NO. 4:15-CR-00566

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Lee Roy Villarreal, by and through undersigned counsel, and requests that the following questions be presented during voir dire of prospective jurors in the above-captioned case.

Respectfully submitted,
/s/ Angelica Cogliano
Angelica Cogliano
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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of May, 2021, a true and correct copy of the foregoing instrument was electronically filed with the Clerk of the Court, using the CM/ECF System which will transmit notification of such filing to all counsel of record.

/s/ Angelica Cogliano
Angelica Cogliano

Defendant's Requested Voir Dire Question No. 1

1. The anticipated witnesses in this case, for both the Government and the Defense are:
(Please refer to the parties' witness lists).
 - Are any of you acquainted with any of these people?
 - If so, would that relationship affect your ability to render a true verdict?

Defendant's Requested Voir Dire Question No. 2

2. Have any of you ever been employed by a law enforcement agency?
 - Do any of you have a family member or close personal friend who has been employed by a law enforcement agency?
 - If so, would that fact affect your impartiality in this case?

Defendant's Requested Voir Dire Question No. 3

3. Have any of you ever been the victim of a crime?
 - Do any of you have a family member or close personal friend who has been the victim of a crime?
 - If so, was it a crime involving violence?
 - If so, would that fact affect your impartiality in this case?

Defendant's Requested Voir Dire Question No. 4

4. Do any of you have a family member or close personal friend who has struggled with a drug addiction?
 - If so, did your family member or close personal friend lose their battle to drug addiction?

Defendant's Requested Voir Dire Question No. 5

5. Do any of you believe that an innocent individual could **not** be accused of committing a serious crime?
 - What about several crimes?

Defendant's Requested Voir Dire Question No. 6

6. Have any of you ever cut ties with a family member or close personal friend because they were involved in criminal activity?

Defendant's Requested Voir Dire Question No. 7

7. Do any of you believe that a law enforcement officer would not lie from the witness stand?

Defendant's Requested Voir Dire Question No. 8

8. The accused has a right to not testify. This cannot be held against him in any way, it cannot be taken as evidence of guilt. Would any of you consider it evidence of guilt if the defendant does not testify?

Defendant's Requested Voir Dire Question No. 9

9. In our system it is the Government's burden to bring you the proof that convinces you beyond a reasonable doubt before you can convict. Would any of you have difficulty finding an accused "not guilty" if you believe he probably did commit a serious crime, but the Government did not bring you sufficient proof to meet their burden?